

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HITACHI CONSUMER ELECTRONICS CO.,
LTD., and HITACHI ADVANCED DIGITAL,
INC.

Plaintiff,

v.

TOP VICTORY ELECTRONICS (TAIWAN)
CO. LTD., TPV INT'L (USA), INC.,
ENVISION PERIPHERALS, INC., TOP
VICTORY ELECTRONICS (FUJIAN) CO.
LTD., TPV ELECTRONICS (FUJIAN) CO.
LTD., TPV TECHNOLOGY LTD., and VIZIO,
INC.,

Defendants;

and

VIZIO, INC.,

Counterclaim-Plaintiff,

v.

HITACHI, LTD., HITACHI CONSUMER
ELECTRONICS CO., LTD., HITACHI
ADVANCED DIGITAL, INC., HITACHI
AMERICA, LTD., and HITACHI HOME
ELECTRONICS (AMERICA), INC.

Counterclaim-Defendants,

CIVIL ACTION NO. 2:10-CV-260-JRG

JURY

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A
PROPOSED PROTECTIVE ORDER**

Plaintiffs Hitachi Consumer Electronics Co., Ltd. And Hitachi Advanced Digital, Inc. and Defendants Top Victory Electronics (Taiwan) Co. Ltd., TPV Int'l (USA), Inc., Envision Peripherals, Inc., Top Victory Electronics (Fujian) Co. Ltd., TPV Electronics (Fujian) Co. Ltd., TPV Technology Ltd., and Vizio, Inc., and counter-claim Defendants Hitachi Ltd., Hitachi Consumer Electronics Co., Ltd., and Hitachi Home Electronics (America), Inc. respectfully request a one week extension to file a joint Proposed Protective Order.

The Court had set a deadline of May 4, 2012, to submit a Proposed Order. Due to the complexity of the case, the parties are continuing to negotiate the terms of the Protective Order and expect to have one completed by Friday, May 11, 2012. The parties do not seek this extension for reasons of undue delay and the extension will not affect the dates for the claim construction hearing or the trial. A Proposed Order is attached.

DATED: May 4, 2012

Respectfully submitted,

/s/ Jeffrey B. Plies

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By: /s/ Brian M. Berliner (with
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Electronics (Fujian) Co., Ltd., and
TPV Technology, Ltd.***

By: /s/ Steven J. Corr (with
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Vizio, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service, Local Rule CV-5(a)(3)(A), on this the 4th day of May, 2012.

/s/Jeffrey B. Plies

CERTIFICATE OF CONFERENCE

Counsel for Plaintiffs Hitachi Consumer Electronics Co., Ltd. And Hitachi Advanced Digital, Inc. and Defendants Top Victory Electronics (Taiwan) Co. Ltd., TPV Int'l (USA), Inc., Envision Peripherals, Inc., Top Victory Electronics (Fujian) Co. Ltd., TPV Electronics (Fujian) Co. Ltd. And TPV Technology Ltd., Vizio, Inc. have complied with the meet and confer requirement in Local Rule CV-7(i).

/s/ Jeffrey B. Plies_____